

James Q. Taylor-Copeland (284743)
james@taylorcopelandlaw.com
TAYLOR-COPELAND LAW
501 W. Broadway, Suite 800
San Diego, CA 92101
Telephone: (619) 400-4944
Facsimile: (619) 566-4341

Marc M. Seltzer (54534)
mseltzer@susmangodfrey.com
Steven G. Sklaver (237612)
ssklaver@susmangodfrey.com
Oleg Elkhunovich (269238)
oelkhunovich@susmangodfrey.com
Meng Xi (280099)
mxi@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, 14th Floor
Los Angeles, CA 90067
Telephone: (310) 789-3100
Facsimile: (310) 789-3150

P. Ryan Burningham (*pro hac vice*)
rburningham@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800
Seattle, WA 98101
Telephone: (206) 516-3880
Facsimile: 206) 516-3883

Counsel for Lead Plaintiff Bradley Sostack

Damien J. Marshall (*pro hac vice*)
dmarshall@kslaw.com
KING & SPALDING LLP
Andrew Michaelson (*pro hac vice*)
amichaelson@kslaw.com
1185 Avenue of the Americas, 34th Floor
New York, NY 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

Suzanne E. Nero (SBN 284894)
snero@kslaw.com
KING & SPALDING LLP
50 California Street, Suite 3300
San Francisco, CA 94111
Tel: (415) 318-1200; Fax: (415) 318-1300

Andrew J. Ceresney (*pro hac vice*)
aceresney@debevoise.com
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, NY 10022
Tel: (212) 909-6000; Fax: (212) 909-6836

*Attorneys for Defendants Ripple Labs Inc.,
XRP II LLC, and Bradley Garlinghouse*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION,

This Document Relates To:

ALL ACTIONS

Case No. 18-cv-06753-PJH

**STIPULATION REGARDING
REVISED STIPULATED
[PROPOSED] PROTECTIVE ORDER**

1 Lead Plaintiff Bradley Sostack and Defendants Ripple Labs, Inc., XRP II LLC, and
 2 Bradley Garlinghouse (collectively, the “Parties”), by and through their respective counsel, agree
 3 and request as follows:

4 WHEREAS, on November 4, 2020, the Court entered the Stipulated Protective Order as
 5 Modified by the Court, ECF No. 120;

6 WHEREAS, the parties are seeking or may seek discovery in this action from third-parties
 7 who produced documents in connection with proceedings in *SEC v. Ripple Labs*, Case No. 20-cv-
 8 10832 (AT);

9 WHEREAS, in order to facilitate third-party discovery in this case in an efficient manner
 10 that will reduce burdens on third-parties to re-produce documents already subject to production in
 11 *SEC v. Ripple Labs*, the Parties have agreed on a revision to the definition of “Designating Party”
 12 in section 2.D of the Protective Order;

13 WHEREAS, the Parties have included the agreed-upon Revised Stipulated [Proposed]
 14 Protective Order as **Exhibit A** and a redline version showing the changes in section 2.D as
 15 **Exhibit B**;

16 NOW, THEREFORE, the Parties, through their respective counsel hereby stipulate and
 17 agree and request the Court order as follows:

- 18 1. Grant the Parties’ request to modify the Protective Order and enter the Revised
 19 Stipulated [Proposed] Protective Order attached as Exhibit A as the operative
 20 Protective Order in the case.

21 IT IS SO STIPULATED.

22 Respectfully submitted,

23 Dated: August 6, 2021

24 By: /s/ James Taylor-Copeland
 25 James Q. Taylor-Copeland (284743)
 26 james@taylorcopelandlaw.com
 27 TAYLOR-COPELAND LAW
 28 501 W. Broadway, Suite 800
 San Diego, CA 92101
 Telephone: (619) 400-4944
 Facsimile: (619) 566-4341

By: /s/ Suzanne E. Nero
 Suzanne E. Nero (SBN 284894)
 snero@kslaw.com
 KING & SPALDING LLP
 50 California Street, Suite 3300
 San Francisco, CA 94111
 Tel: (415) 318-1200; Fax: (415) 318-1300

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

DATED: August 6, 2021

/s/ Suzanne E. Nero
Suzanne E. Nero

[PROPOSED] ORDER

Pursuant to the foregoing stipulation, IT IS SO ORDERED.

Dated:

The Honorable Phyllis J. Hamilton
United States District Judge